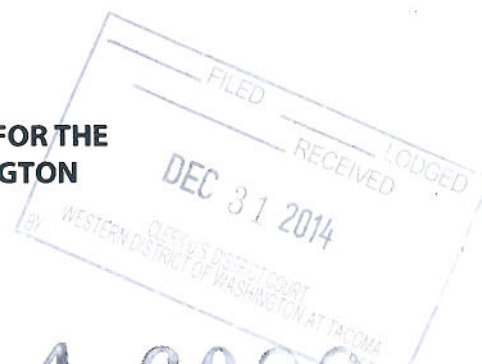


Print Form

## Instructions for use:

1. Check the above box "Highlight Fields" to show fields on this form.
2. Complete the form.
3. Print, sign the document, and file with the court.

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

CV14 6029 BHS

Mansour M. Veracruz

Plaintiff(s)

vs.

M. B. Hendrix, M.D.

Franciscan Health  
St. Joseph Medical Center

Defendant(s),

CIVIL RIGHTS COMPLAINT UNDER  
42 U.S.C. §1983

(for use only by plaintiffs not in custody)

JURY DEMAND

## Parties to this Complaint:

Plaintiff's  
Name,  
Address and  
Phone  
NumberMansour M. Veracruz  
420 Coal, S.E. #7  
Albuquerque, New Mexico 87102  
(505)- 448-9252Defendant's  
Name,  
Address and  
Phone  
NumberM.B. Hendrix, M.D.  
1717 South J Street  
Tacoma, Washington 98405  
(253)- 426-4101Defendant's  
Name,  
Address and  
Phone  
NumberFranciscan Health  
St. Joseph Medical Center  
1717 South J Street  
Tacoma, Washington 98405  
(253)- 426-4101

1 Defendant's  
2 Name,  
3 Address and  
4 Phone  
5 Number

6 (If you have more defendants, list them using the same outline on another piece of paper.  
7 Attach additional sheets, if necessary)

8 **Previous Lawsuits:**

9 Have you brought any other lawsuits in any federal court in the United States:?

10 ☐ No

11 ☒ Yes

12 If Yes, how many?

13 2

14 **Describe the lawsuit:**

15 Parties to this previous lawsuit:

16 Plaintiff(s)

17 James H. White

18 Defendant(s)

19 City of Portland, Et AL

20 (If there is more than one previous lawsuit, describe the additional lawsuits on another  
21 piece of paper using the same outline. Attach additional sheets, if necessary)

22 Court and Name of District:

23 U.S. District Court  
24 District of Washington, Seattle

25 Docket Number:

26 CO 7-1708

Assigned Judge:

Case was transfered to Portland, Or  
Case was settled outside of Court

Disposition :

(For example, was the case  
dismissed as frivolous or for  
failure to state a claim? Was it  
appealed? Is it still pending?)

Settled

Approximate filing date of lawsuit:

Oct 19, 2007

Approximate date of disposition:

Nov 1, 2007

**Statement of Claim**

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates, places, and other persons involved. **Do not give any legal arguments or cite any cases or statutes.** If you allege a number of related claims, number and set forth each claim in a separate paragraph. (Attach additional sheets if necessary.)

(1) Plaintiff leg was unlawfully amputated. Plaintiff can document, that the hospital allowed the defendant Doctor to remove plaintiff's leg up to the groin without proper evidence of the need for removal.

(2) Defendant gave false information to plaintiff and consent was not fully formed for the surgery.

(3) Plaintiff refused the surgery three-times and actually left the the hospital. Came back to the hospital by emergency because plaintiff had passed out, or thought to have passed-out, when upon arrival the plaintiff's leg was amputated without medically tested grounds.

(4) The defendant doctor did not have adequate experience in this type of surgery and held himself out to the community as having experience in "Fractures".

(5) Cutting the plaintiff's leg-off would bring more money into the hospital from plaintiff's federal insurance than fixing plaintiff's sore.

(6) Plaintiff can prove through documentation that the defendant Doctor falsified Documents to justify the illegal surgery, with the hospital's full knowledge and consent.

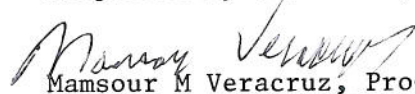
(7). As a direct and proximate result of defendant hospital's conduct, plaintiff continues to suffer from such mental anguish and distress and will so continue to suffer for the remainder of his life. That damage is so severe, terrible, and horrendous as to be almost impossible to place a precise dollar value on it at this time; however; such damages will be proved at trial.

WHEREFORE, plaintiff request judgement against defendants and each of them, jointly and severally, for

1. Damages, including putative damages according to proof at trial, with interest as allowed by law from the date of judgement until paid.
2. Attorneys fee Cost of suit and
3. Such other and further relief as the court deems just and proper.

Dated: December 29, 2014

Respectfully Submitted,

  
Mamsour M Veracruz, Pro-Se

Plaintiff also alleges that both defendants have violated the Federal False claims Act.